

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	§	
	§	Chapter 11
	§	
GWG Holdings, Inc., <i>et al.</i> , ¹	§	Case No. 22-90032
	§	
Debtors.	§	
	§	

**AGREED ORDER GRANTING MOTION FOR RELIEF FROM
THE AUTOMATIC STAY TO (A) APPOINT LEAD PLAINTIFFS IN SECURITIES
CLASS ACTION, (B) PERMIT LEAD PLAINTIFFS TO SERVE AND ENFORCE
THIRD-PARTY SUBPOENAS, AND (C) TAKE RELATED ACTIONS**

[Related Docket Nos. 201 and 218]

Came on for consideration, the *Unopposed Motion for Relief from the Automatic Stay to (A) Appoint Lead Plaintiffs in Securities Class Action; (B) Permit Lead Plaintiffs to Serve and Enforce Third-Party Subpoenas; and (C) Take Related Actions* (the “Motion”)² of the Proposed Lead Plaintiffs; and it appearing that the Court has jurisdiction over this matter; and it appearing that notice of the Motion is adequate and sufficient; and the Court having determined that the legal and factual bases set forth in the Motion establish good cause for granting the Motion; and after due deliberation and sufficient cause appearing therefor, it is hereby

ORDERED, ADJUDGED, AND DECREED that:

1. The automatic stay is modified to:

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are: GWG Holdings, Inc. (2607); GWG Life, LLC (6955); and GWG Life USA, LLC (5538). The location of Debtor GWG Holdings, Inc.’s principal place of business and the Debtors’ service address is 325 N. St. Paul Street, Suite 2650 Dallas, TX 75201. Further information regarding the Debtors and these chapter 11 cases is available at the website of the Debtors’ proposed claims and noticing agent: <https://donlinrecano.com/gwg>.

² Capitalized terms not otherwise defined herein shall have the meaning ascribed to such terms in the Motion.

- a. retroactively permit the filing of the Lead Plaintiff Motion and to allow the Proposed Lead Plaintiffs to pursue and obtain an order from the District Court on their Lead Plaintiff Motion;
- b. permit, at their election, the Proposed Lead Plaintiffs to serve and enforce third-party subpoenas on the two registered investment advisors who solicited their investments in the securities at issue in the Securities Class Action, provided that such actions can be taken without violating any order of the District Court, without waiving the stay of discovery under the Private Securities Litigation Reform Act, and without any costs accruing to the Debtors; and
- c. take actions in the District Court consistent with the Motion and this Order.

2. This Order shall be strictly limited to its terms, and specifically, the modification of the automatic stay to permit any other proceedings or action against any of the Debtors in the Securities Class Action shall be subject to further order of this Court. This Order does not confer upon the Proposed Lead Plaintiffs or their counsel any status not otherwise conferred by law.

3. Subject to the reservation of rights set forth in this paragraph, the *Limited Objection of L Bond Management LLC to Unopposed Motion For Relief From the Automatic Stay to (A) Appoint Lead Plaintiffs In Securities Class Action, (B) Permit Lead Plaintiffs To Serve and Enforce Third-Party Subpoenas, and (C) Take Related Actions* [ECF # 218] is hereby resolved and withdrawn. Nothing herein shall prejudice LBM's right to challenge the Movant's capacity to act as a representative or agent of any alleged member of the purported class, as defined now or in any subsequent amendment or attempted amendment, of plaintiffs in the Class Action, and it is expressly understood and memorialized herein that the relief granted in this Order shall be limited solely to the relief explicitly granted herein and is without effect with respect to class certification

or designation as a class representative or fiduciary pursuant to Federal Rule of Civil Procedure 23(a).

SIGNED this _____ day of _____, 2022.

THE HONORABLE MARVIN ISGUR
UNITED STATES BANKRUPTCY JUDGE

Agreed as to form and substance:

HUGHES WATTERS ASKANASE, LLP

By: /s/ Wayne Kitchens

Wayne Kitchens (TBN 11541110)
Heather Heath McIntyre (TBN 24041076)
TotalEnergies Tower
1201 Louisiana, 28th Floor
Houston, Texas 77002
Telephone: (713) 759-0818
Facsimile: (713) 759-6834
Email: wkitchens@hwa.com
hmcintyre@hwa.com

OKIN ADAMS BARTLETT CURRY LLP

By: /s/ David L. Curry, Jr.

Matthew S. Okin
Texas Bar No. 00784695
Email: mokin@okinadams.com
David L. Curry, Jr.
Texas Bar No. 24065107
Email: dcurry@okinadams.com
1113 Vine Street, Suite 240
Houston, Texas 77002
Tel: (713) 228-4100
Fax: (346) 247-7158

-and-

Attorneys for L Bond Management LLC

GIRARD SHARP LLP

Daniel Girard
Jordan Elias
Sean Greene
601 California Street, Suite 1400
San Francisco, CA 94108
Telephone: (415) 981-4800
Facsimile: (415) 981-4846
Email: dgirard@girardsharp.com
jelias@girardsharp.com
sgreene@girardsharp.com

-and-

MALMFELDT LAW GROUP P.C.

Paul D. Malmfeldt
120 N. LaSalle Street, Suite 2000
Chicago, IL 60602
Telephone: (312) 606-8625
Email: pdm@malmfeldt.com

-and-

**KRAMER LEVIN NAFTALIS &
FRANKEL LLP**

Douglas H. Mannal
Joseph A. Shifer
1177 Avenue of the Americas
New York, New York 10036
Telephone: (212) 715-9100
Facsimile: (212) 715-8000
Email: dmannel@kramerlevin.com
jshifer@kramerlevin.com

Counsel to the Proposed Lead Plaintiffs

MAYER BROWN LLP

By: /s/ Thomas S. Kiriakos

Charles S. Kelley (TX Bar No. 11199580)
700 Louisiana Street, Suite 3400
Houston, TX 77002-2730
Telephone: (713) 238-3000
Email: ckelley@mayerbrown.com

-and-

Thomas S. Kiriakos (*pro hac vice*)
Louis S. Chiappetta (*pro hac vice*)
71 S. Wacker Drive
Chicago, IL 60606
Telephone: (312) 701-0600
Email: tkiriakos@mayerbrown.com
lchiappetta@mayerbrown.com

-and-

Adam C. Paul (*pro hac vice*)
Lucy F. Kweskin (*pro hac vice*)
1221 Avenue of the Americas
New York, NY 10020-1001
Telephone: (212) 506-2500
Email: apaul@mayerbrown.com
lkweskin@mayerbrown.com

*Proposed Counsel for the Debtors and Debtor
in Possession*